

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

ROBERTA AGYEMAN, et al.

Civil Docket Number: 18-cv-05320

PLAINTIFFS,

FIRST NOTICE OF AMENDMENT

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

Roberta Agyeman, et al. v. Islamic Republic of Iran, No. 1:18-cv-05320 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 7 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

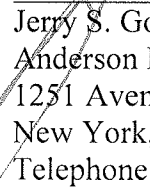
	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
98	Ahmed, Thanbir	NY	United States	Ahmed, Shabbir	Son	¶ 5
99	Ahmed, Jeba	NY	United States	Ahmed, Shabbir	Spouse	¶ 5

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
100	Ahmed, Nadia	NY	United States	Ahmed, Shabbir	Daughter	¶ 5
101	Ahmed-Green, Salma	NY	United States	Ahmed, Shabbir	Daughter	¶ 5
102	Aldridge Jr., Willie	GA	United States	Aldridge, Jacquelyn D.	Brother	¶ 6
103	Aldridge, Delores	GA	United States	Aldridge, Jacquelyn D.	Sister	¶ 6
104	Aldridge-Holder, Marjorie	GA	United States	Aldridge, Jacquelyn D.	Sister	¶ 6
105	Allen, Richard	NY	United States	Allen, Richard L.	Father	¶ 7
106	Alonso, Victoria	NY	United States	Alonso, Janet	Daughter	¶ 8
107	Banyo, Karen	NY	United States	Alonso, Janet	Sister	¶ 8
108	Alonso, Robert	NY	United States	Alonso, Janet	Son	¶ 8
109	Russo, Cheryl	NY	United States	Alonso, Janet	Sister	¶ 8
110	Amatuccio, Anthony	MN	United States	Amatuccio, Joseph	Brother	¶ 11
111	Amatuccio, Dina	NY	United States	Amatuccio, Joseph	Daughter	¶ 11
112	Amatuccio, Joseph	NY	United States	Amatuccio, Joseph	Son	¶ 11
113	Callori-Amatuccio, Antoinette	PA	United States	Amatuccio, Joseph	Sister	¶ 11
114	Asaro, Carl	NY	United States	Asaro, Carl	Son	¶ 15
115	Asaro, Rebecca	NY	United States	Asaro, Carl	Daughter	¶ 15
116	Asaro, Marc	NY	United States	Asaro, Carl	Son	¶ 15
117	Asaro, Matthew	NY	United States	Asaro, Carl	Son	¶ 15

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
118	Asaro, Philip	NY	United States	Asaro, Carl	Son	¶ 15
119	Audiffred, Jason	NY	United States	Audiffred, James	Son	¶ 16
120	Ayala, Leyda C.	NY	United States	Ayala, Samuel (Sandy)	Spouse	¶ 17
121	Baierwalter, Veronica	NY	United States	Bairwalter, Robert J.	Daughter	¶ 21
122	Baierwalter, Raymond	NY	United States	Bairwalter, Robert J.	Son	¶ 21

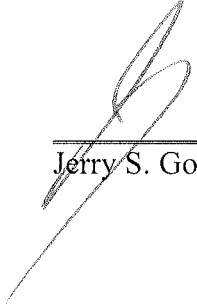
Dated: June 26, 2018

Respectfully submitted,


 Jerry S. Goldman
 Anderson Kill P.C.
 1251 Avenue of the Americas
 New York, New York
 Telephone: 212-278-1000
jgoldman@andersonkill.com
 COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman